

## Frequently Asked Questions “Say Dyslexia” Guidance

In 2016, the general assembly passed the [Chapter 1058 of the Public Acts of 2016](#) (i.e., “Say Dyslexia” law), which requires school districts to screen for characteristics of dyslexia through their existing Response to Instruction and Intervention (RTI<sup>2</sup>) procedures and to provide “dyslexia-specific tiered interventions” for students that demonstrate a need. The following are frequently asked questions and answers regarding the “Say Dyslexia” law.

**1. *At what point must a screening for characteristics of dyslexia be completed?***

- All students will be screened as part of the universal screening process within the existing RTI<sup>2</sup> framework (i.e., see Figures 1–3, pages 19–21 of the [RTI<sup>2</sup> framework manual](#)). Dyslexia screening may also be requested for any student by the student's parent or guardian, teacher, counselor, or school psychologist. Screening for dyslexia should not be considered a separate process. Additionally, schools should **not** wait to screen students until a certain amount of time has elapsed within interventions (i.e., attempt interventions and only screen further if the student does not make progress).

**2. *What sources of data can be used in addition to the universal screening measure to help identify characteristics of dyslexia?***

- Universal screening should include multiple sources of data to identify individual student strengths and areas of need. This data may include teacher observations, informal checklists, classroom performance, or formative assessments, summative assessments or other standards-based assessments administered by the LEA. A reading resources document that can be found [here](#) provides information on reading assessment tools that might be used to gather additional data. After the multiple sources of data have been reviewed and analyzed, the school-based team then decides on next best steps for the student.

**3. *Are there “cut-off” scores when considering the characteristics of dyslexia?***

- The process for determining whether a student demonstrates characteristics of dyslexia is the same process for the identification of all academic deficits under the [RTI<sup>2</sup> framework](#) (refer to component 1.3 and 1.4).
  - As a guideline, educators should look at students scoring below the 25th percentile compared to national norms on a skills-based screener, corroborating their performance with multiple sources of data (as described above) to determine those who are “at risk” (see Component 1.3). Students who are considered “at risk” should receive appropriately aligned skills-based interventions in addition to Tier I instruction.
  - In grades K–12, students identified as “at risk” based on multiple sources of data should be administered survey-level and/or diagnostic assessments to determine student intervention needs. As required by the “Say Dyslexia” law, these survey-level assessments for reading must explicitly measure characteristics of dyslexia to include: phonological and phonemic awareness, sound symbol recognition, alphabet knowledge, decoding skills, rapid naming, and encoding skills. Please see the department's [Dyslexia Resource Guide](#) for additional information on these requirements.

#### **4. *What is rapid naming, and how is it addressed?***

- Rapid naming is defined in the Dyslexia Resource Guide as the ability to connect visual and verbal information by giving the appropriate names to common objects, colors, letters, and digits. It refers to the ability to name familiar or known items quickly, which involves retrieving information (e.g., phonological codes) from long-term memory efficiently. This is important when learning to read, as efficient retrieval (i.e., automaticity) impacts how a student remembers and recalls the coding of sounds and impairs accuracy when decoding written words.
- Screening measures that include timed fluency items address skills associated with rapid naming. However, it is important to note that further drill down/diagnostic measures may be needed to determine if underperformance on such measures is due to deficits with phonological or decoding skills versus rapid naming, as fluency measures often include items the student has not mastered yet. For example, a student who performs poorly on a letter naming fluency measure may do so because the student does not have alphabet knowledge. Rapid naming deficits may be more likely if the student knows all presented letters, but is unable to quickly name them.
- Knowing a student displays rapid naming deficits, along with difficulties in reading skills, informs intervention planning. The interventions should focus on improving deficits in reading following the dyslexia-specific intervention methodology. The methodology provides techniques (e.g., multisensory, systematic, and cumulative) and approaches needed for students demonstrating rapid naming deficits. In addition, teams should consider any accommodations needed to access instruction (e.g., extended time on assessments, wait time for responses, etc.).

#### **5. *What expertise does a speech/language pathologist have in relation to screening for characteristics of dyslexia?***

- While dyslexia is typically considered a specific learning disability, speech language pathologists (SLPs) are trained to identify phonological skills associated with speaking and reading. Such training may be helpful when addressing characteristics of dyslexia through the screening process and intervention planning on an as-needed basis. For further information about ways to involve an SLP, refer to: <https://www.asha.org/public/speech/disorders/LBLD/>.
- Additionally, it may be important to involve an SLP when language and/or articulation deficits are more pervasive. In such cases, teams may need to consider different types of pre-referral interventions and referrals for speech or language impairment evaluations.

#### **6. *What are some approved dyslexia-specific interventions?***

- Pursuant to T.C.A. § 49-1-229, a “dyslexia-specific intervention” is defined as specialized instruction that is multisensory, direct (i.e., explicitly taught), systematic and cumulative, and targeting characteristics of dyslexia.
  - Dyslexia screening procedures must include phonological and phonemic awareness, sound symbol recognition, alphabet knowledge, decoding skills, rapid naming, and encoding skills. When students struggle with these characteristics, dyslexia-specific interventions are aligned to the skill deficit identified. Students requiring intervention in these areas do not necessarily have dyslexia.
  - A program does not have to be “boxed” to meet these requirements. Ensure that the methods and materials you use meet the legal requirements using Appendix H of the [Dyslexia Resource Guide](#).

**7. What is the purpose of needs-based progress monitoring tools?**

- There are two types of progress monitoring tools, general outcome measures and mastery measures (also called “needs-based”). Both are important, but serve differing roles.
- **General outcome measures (GOM)** are based on identifying a single general task that provides an indication of change in the general outcome desired (e.g., efficient oral reading). Probes, administration, and scoring are standardized to produce reliable and valid scores. Such measures typically provide a comparison of growth over time, which allows for teams to track the potential closure or increase of a student’s achievement gap (i.e., gap analysis).
- **Mastery measures (MM)** are based on breaking down an outcome, like reading proficiency, into small component skills and measuring progress in attaining mastery of each of those small component skills. Ultimately, progress on mastery measures should produce progress on general outcome measures. In other words, if a student is progressing in his/her understanding and application of particular vowel patterns (MM), then he/she should ultimately be able to read more words at a faster rate (GOM). This information may help inform daily instruction and can be used in evaluations as qualitative information to help describe progress or lack of progress.

**8. Is there a process for a teacher to communicate concerns about a student and dyslexia?**

- Teacher concerns should be addressed as part of the universal screening process. The [RTI<sup>2</sup> framework](#) outlines the universal screening procedures in component 1.3 (see Figures 1–3, pages 19–21 of the [RTI<sup>2</sup> framework manual](#)). Within the screening process, teams should include the use of additional, appropriate sources of data, including diagnostic assessments, achievement tests, teacher observations, and student records (e.g., grades, attendance, behavioral concerns/incidents). The additional information is helpful for making decisions regarding student academic support. Team decisions regarding the need for tiered interventions should be made using multiple sources of data, including teacher concerns, and not solely based on one measure. When teacher concerns do not match the findings of the universal screening tool, additional measures or data may need to be collected for the team to make the most informed decision to meet student needs as part of the screening process.
- All districts are required to have Child Find procedures related to 504 and special education, which include referral procedures accessible to teachers and parents when an educational disability is suspected.

**9. What is an appropriate response to a parent/teacher request for testing for dyslexia?**

- T.C.A. § 49-1-229, provides that dyslexia screening may be requested for any student by the student’s parent or guardian, teacher, counselor, or school psychologist.
- If a parent or teacher requests testing, it is important to follow up to clarify if the parent/teacher would like further screenings completed related to characteristics of dyslexia or if testing refers to an evaluation for section 504 (see the office of civil rights [document](#) and the department’s [section 504 guide](#) for further information regarding 504 evaluations) or special education eligibility. School teams should consider all requests for evaluations in conjunction with a review of all relevant collected data on the referral concern. If the team has reason to suspect an educational disability, the team must initiate a special education evaluation referral to determine the presence of the disability and eligibility for services (see the [OSEP 11-7 memo](#)).
- Should the parent or teacher request further dyslexia screening, the team should consider the information provided and review multiple data sources to determine if additional screening is

warranted. The team may decide to complete more diagnostic measures to help better inform intervention decisions and planning.

**10. Is an outside “diagnosis” of dyslexia required for 504 consideration?**

- An external “diagnosis” of dyslexia is not required before consideration of eligibility for a 504. Eligibility for a section 504 plan is based on an evaluation (see the office of civil rights [document](#) and the department [section 504 guide](#) for further information regarding 504 evaluations) and the determination that a student’s mental or physical impairment substantially limits one or more major life activity (including reading). A school evaluation can address the profile of dyslexia, and results may be sufficient to determine a possible impairment. The profile of dyslexia is considered a type of specific learning disability. Should the team consider a referral to special education, the student would need to meet the educational criteria for a specific learning disability as outlined by the Tennessee evaluation standards ([here](#)).

**11. What types of accommodations require a 504 or IEP for state testing?**

- There are three categories of accessibility supports to consider for state testing, and detailed charts for each category can be found in the [Accessibility Guide](#) on pages 30–32.
  - Allowable test conditions are available to any student based on individual need (e.g., small group testing, time of day).
  - Accessibility features are available to any student, but should be determined on an item-by-item basis based on the tools the student uses during instruction and in daily life (e.g., student reads to self, highlighter).
  - Accommodations are only available to students with a disability served under an IEP or 504 plan, or students classified as English learners (e.g., extended time, adult transcription).
- Accessibility features and accommodations should be provided during classroom instruction and classroom assessments; however, some instructional accessibility supports may not be appropriate for use on certain statewide assessments. In other cases, accessibility supports provided on assessments may be slightly different from those provided in the classroom. It is important that educators help students become familiar with the supports provided so that students are not using these tools for the first time on test day.

**12. When is it appropriate for the team to refer the student for an evaluation for special education?**

- A student may demonstrate characteristics of dyslexia and not demonstrate an educational disability requiring special education services. Teams must consider the level of intervention needed within a continuum, with special education being the most intensive intervention. A student’s lack of responsiveness in general education interventions may indicate a need for specialized instruction and a possible disability adversely impacting educational performance. Teams should refer for an evaluation when there is reason to suspect an educational disability.
- When considering a referral to special education for a primary or secondary disability, there are 16 disability categories in Tennessee (intellectually gifted and functional delay were added to the 14 IDEA categories). Dyslexia falls under the specific learning disability (SLD) category, and evaluation requirements for SLD criteria follow standards which reflect a lack of responsiveness to intervention.
  - Evaluation criteria outline the required components for an evaluation for a specific learning disability. While not required components, the team may include additional

assessments related to dyslexia as part of the assessment plan to help the team plan appropriately for student needs.

- In addition, there is nothing that prohibits the use of the term “dyslexia” in special education evaluations or IEPs when it is determined a student demonstrates the profile of dyslexia (see [OSER’s Dear Colleague letter](#) providing dyslexia guidance).
- Outside evaluations must be considered by the school team, and then the team must determine if further evaluations are needed/warranted to determine the presence of a disability based on the disability definition and criteria.
- If after consideration of the referral, an educational disability is not suspected, the team may refuse an evaluation. In such cases, prior written notice must be provided to the parent indicating the reasons for refusal.
- If the team has reason to suspect an educational disability, the team must evaluate to determine the presence of the disability and eligibility for services (see the [OSEP 11-7 memo](#)).

**13. Do we have to do the entire dyslexia evaluation battery for all evaluation for a specific learning disability in basic reading?**

- It is not required to complete a dyslexia evaluation battery as part of an evaluation of a specific learning disability (an example of the dyslexia evaluation battery can be found at: <https://dyslexiaida.org/testing-and-evaluation/>) The standards (i.e., evaluation procedures battery and participants) associated with an evaluation for a specific learning disability can be found [here](#) under evaluation and eligibility/specific learning disability. However, assessment planning is a team decision, and there is nothing that prevents the team from completing additional assessments if the team feels they are warranted to determine free appropriate public education programming (i.e., IEP goals and services). In addition, there is nothing that prohibits the use of the term “dyslexia” in special education evaluations or IEPs when it is determined a student demonstrates the profile of dyslexia (see [OSER’s Dear Colleague letter](#) providing dyslexia guidance).

**14. What information are districts required to provide in relation to the “Say Dyslexia” law?**

- The dyslexia advisory council is required to annually report the number of students receiving a dyslexia-specific intervention, state testing accommodations for these students, a description of intervention services provided to students, and TVAAS growth for these students (when available).
- To collect this data for reporting: (flowchart found [here](#)):
  - Schools must enter an attendance code into the student information system (SIS) for each student who is receiving a dyslexia-specific intervention due to identified characteristics of dyslexia. Ensure that you have a school-specific process for communicating these student names to attendance in order to code students throughout the school year as they enter dyslexia-specific interventions. Once the code is entered for a student, the code remains for the rest of the school year.
  - Districts must enter the description of dyslexia-specific interventions into the annual LEA plan.
  - The department will use the student coding in the SIS/EIS to pull information regarding the students’ accommodations and TVAAS growth.

**15. Which students are coded in the student information system (SIS) as having characteristics of dyslexia, and therefore, also receive a letter?**

- The students who **are** coded in your SIS system (and parents receive a letter):
  - have shown a characteristic(s) of dyslexia through your screening process, **and**
  - the school-based team has determined that a dyslexia-specific intervention (see question #6) is appropriate for the student.
    - Based on the two conditions above, it *could* be a student in Tier II, III, or special education intervention, and there will be students in Tier II, III, or special education intervention that will not get coded because they do not meet the two conditions above.
    - Given the content of the K–1 standards, it is likely that many students in these grades who need reading intervention will be receiving intervention in areas commonly associated with characteristics of dyslexia. If they have a characteristic and the team determines that a dyslexia-specific intervention is appropriate, they will be coded in the SIS, and parents will receive a letter.
- The students who are coded in your SIS system (and parents receive a letter) are **not determined** based on:
  - the tier of the student,
  - whether the student has an IEP or not,
  - the eligibility of a student with an IEP, or
  - even, necessarily, the name of the intervention or “program.”
  - There may be students receiving an intervention that is focused on the characteristics of dyslexia, but the student may not have deficits in that area—in other words, there could be misalignment of:
    - the deficit and the intervention.
    - the eligibility and the intervention, or
    - eligibility with no intervention.
    - There may also be students who appear to have a characteristic of dyslexia, but the team decides that a dyslexia-specific intervention is not appropriate (i.e., an English learner (EL) that has been in the country for a few weeks).

**16. Are students who are coded as receiving a dyslexia-specific intervention/receive a parent letter considered to have dyslexia?**

- It should not be assumed that that student who demonstrates characteristics of dyslexia and thus receives a “dyslexia-specific intervention” has dyslexia. The screening and problem-solving process that teams use to determine evidenced-based interventions is a proactive approach to address deficits that are associated with dyslexia. However, there are many reasons for such deficits; therefore, not every student who demonstrates characteristics of dyslexia will actually have the profile of dyslexia.

**17. What information must be provided to parents regarding characteristics of dyslexia?**

- Districts must notify the parent or legal guardian of each student who is receiving a dyslexia-specific intervention due to identified characteristics of dyslexia. A sample parent letter has been provided in Appendix F of the [Dyslexia Resource Guide](#). Districts may use this letter, or edit or create their own letter that is aligned to the legal requirements.



- Districts must also provide the student's parent with information and resources. Helpful links are included in Appendix I of the [Dyslexia Resource Guide](#).
- Districts may also proactively educate community members about matters related to dyslexia.
  - Additionally, the department is collaborating with STEP (Support and Training for Exceptional Parents) to develop a one-page resource document, as well as a parent training.

**18. What external stakeholders has the department communicated and/or collaborated with regarding matters related to dyslexia?**

- The ["Say Dyslexia" law](#) requires the department to work with a dyslexia advisory council for the purpose of advising the department in matters relating to dyslexia.
  - Members of the council must include: the commissioner of education or commissioner designee, an education specialist from the department, a representative from a dyslexia advocacy group, a special education teacher with understanding of dyslexia, an elementary school teacher, a middle school teacher, a high school teacher, a parent of a child with dyslexia, and a licensed speech pathologist.
  - All members contributed to the Dyslexia Resource Guide by providing feedback to the department as it was written.
- The department is also collaborating with a parent training agency (i.e., STEP) to develop resources, such as one-page parent documents and parent training content.
- Public input and comments have also been solicited as part of the creation of the Dyslexia Resource Guide. In addition, all dyslexia advisory council meetings are open to public. Find information about meetings on the council web page ([here](#)).

**19. What professional development opportunities are available to districts?**

- Previous opportunities in 2016-17 have included fall regional trainings and sessions at conferences (e.g., LEAD Conference, Tennessee Association of School Psychologists, and the Special Education Supervisors' Conference).
- The department will continue to support districts with training and resources, such as conference sessions (e.g., Partners in Education Conference), spring regional trainings, and collaboration with CORE interventionists through existing professional learning communities. In addition, a webinar regarding implementation of the "Say Dyslexia" law is [here](#) and the Dyslexia Resource Guide was released in May 2017 and is posted on the department's website ([here](#)).
  - There is also a link for special education directors to [request professional development](#) from the division of special populations. These requests are reviewed twice a month, and a plan for efficient and effective delivery will be developed and communicated with the requestor.